3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- [X] Preserve the integrity of this ongoing case;
- [X] Ensure the safety of investigative personnel;

	[X]	Protect the identity of potential witnesses;
	[X]	Allow for the seizure of evidence;
	[X]	Permit the arrest of those charged with violations of criminal laws;
	[]	Allow this defendant to complete the cooperation aspects of the plea agreement;
	[]	Avoid unfair prejudice to the defendants
	WHEI	REFORE, for the foregoing reasons, the United States moves to seal this
Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed		

form of Order is attached.

Respectfully submitted,

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